

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

COMMISSIONS IMPORT EXPORT S.A.,  
Petitioner,

v.

REPUBLIC OF THE CONGO and  
ECREE LLC,

Respondents.

No. 19-mc-00195-KPF

**DECLARATION OF JOSE VEIGA IN SUPPORT OF MOTION TO VACATE  
CERTIFICATE OF DEFAULT**

I, António José da Silva Veiga, hereby declare as follows:

1. I am a Portuguese national living in Cascais, Portugal.
2. I am the sole owner of the Spanish company, Mivux, S.A.O, which owns Ecree LLC.
3. Ecree LLC was founded May 2014 in New York, NY for the purpose of owning real estate in New York.
4. On May 29, 2014, K&L Gates was retained to represent Ecree LLC in its purchase of real estate in New York.
5. Specifically, K&L Gates represented Ecree LLC for the purchase of Unit 32G in the Trump International Hotel and Tower, located at One Central Park West, New York, New York ("the Condominium").
6. Sebrit Limited, a Cypriot company of which I am the sole Director, transferred the funds necessary for Ecree LLC to purchase the Condominium.

7. In June and July 2014, Sebrit sent two wire transfers, one directly to the seller, the deposit, and the other to K&L Gates for the remaining price.
8. The funds used to purchase the Condominium were not the product of illegal or fraudulent transactions. These funds were the proceeds of work performed by Sebrit on behalf of its clients pursuant to legitimate contracts.
9. I have no knowledge of or involvement in any of the allegations contained in the Petition, claiming that the Republic of the Congo engaged in money laundering or fraudulent transactions. These allegations bear no relation to either myself or Ecree LLC.
10. The Condominium was not purchased for the use of Republic of the Congo, and the Republic has no ownership interest in the Condominium.
11. As far as I am aware, the allegations contained in the Petition to Turnover Property are purely speculative and have no basis in fact. At the time the Petition was filed, April 2019, I was in Portugal, where I remain today.
12. In April 2019, Global Witness published an article making defamatory allegations against me and my business.
13. Those allegations triggered criminal investigations by Portuguese authorities into whether I engaged in money laundering and fraud. Although the investigations commenced in 2013, they have not resulted in any charges being filed against me either in Portugal, the Republic of the Congo or any other jurisdiction.
14. It is my understanding that the Global Witness allegations also triggered an investigation by Swiss authorities. As with the other investigations, I was not charged with any offenses by the Swiss Authorities regarding any matter. To the best of my knowledge,

there are no investigations, legal procedures or charges, pending against me related to the Republic of the Congo or any other matter.

15. Attached to this declaration is an Affidavit from my Portuguese attorneys who represented me during this Portuguese investigation. This Affidavit provides further information regarding this investigation.

16. Until January 2020, I did not have any knowledge of this civil action.

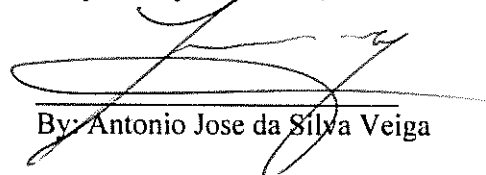
17. Upon being notified of this action, I arranged for Ecree LLC to immediately engage Nixon Peabody LLP to represent Ecree LLC in this matter.

18. Until January 28, 2020, I also did not have any knowledge of the Verified Complaint and Notice of Pendency against Ecree LLC filed by the Board of Managers of Trump International Hotel & Tower Condominium to collect unpaid common charges.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this date, \_\_\_\_\_ in \_\_\_\_\_.

Date: February 20, 2020

Respectfully Submitted,

  
By: Antonio Jose da Silva Veiga